

Lexi J. Hazam (SBN 224457)
lhazam@lchb.com
 LIEFF CABRASER HEIMANN
 & BERNSTEIN, LLP
 275 Battery Street, 29th Floor
 San Francisco, CA 94111-3339
 Telephone: (415) 956-1000

Previn Warren (*pro hac vice*)
pwarren@motleyrice.com
 MOTLEY RICE LLC
 401 9th Street NW, Suite 630
 Washington, DC 20004
 Telephone: (202) 386-9610

Plaintiffs' Co-Lead Counsel

Jennie Lee Anderson (SBN 203586)
jennie@andrusanderson.com
 ANDRUS ANDERSON LLP
 155 Montgomery Street, Suite 900
 San Francisco, CA 94104
 Telephone: (415) 986-1400

Plaintiffs' Liaison Counsel

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

H.F. and C.A., v. Meta, et al., 4:24-cv-08885;
SB and JC, v. Meta, et al., 4:24-cv-09400;
RN and AR, v. Meta, et al., 4:24-cv-09406;
AG and MT, v. Meta, et al., 4:24-cv-09354;
T.S. ind. & obo E.S., v. ByteDance, Ltd, et al.,
 4:25-cv-00060;
L.G. ind. & obo E.B., v. ByteDance, Ltd, et
al., 4:25-cv-00100;
D.M. and M.A., v. Meta, et al., 4:25-cv-
 00118;
L.G. ind. & obo K.B., v. ByteDance, Ltd, et
al., 4:25-cv-00122;
E.W. and K.W., v. Meta, et al., 4:25-cv-
 00161;
M.S. and S.K., v. Meta, et al., 4:25-cv-00169;
M.C. ind. & obo A.N., v. Meta, et al., 4:25-cv-

**DECLARATION OF JENNIE LEE
 ANDERSON IN SUPPORT OF
 PLAINTIFFS' ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL
 EXHIBITS TO THE DECLARATION OF
 JENNIE LEE ANDERSON IN SUPPORT OF
 PLAINTIFFS' THIRTEENTH
 CONSOLIDATED *EX PARTE*
 APPLICATION FOR APPOINTMENT OF
 GUARDIANS *AD LITEM***

00270;

B.R. and L.R., v. Meta, et al., 4:25-cv-00282;

A.B. by and through her Guardian Ad Litem Robert Budreau v. Meta, et al., 4:25-cv-01269;

J. C., by and through his Guardian Ad Litem, Kenyatta Leflore v. Meta, et al., 4:25-cv-02399;

K.H., by and through April Howell v. Snap Inc et. al., 4:25-cv-02985.

I, Jennie Lee Anderson, do hereby declare and state as follows:

1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted to practice before the courts of the State of California and in the Northern District of California. I am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent Addiction/Personal Injury Products Litigation*, Case No. 4:22-MD-03047, and a counsel of record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters stated below.

2. I make this declaration in support of Plaintiffs' Administrative Motion to File Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Thirteenth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Administrative Motion to Seal").

3. For the reasons set forth in Plaintiffs' administrative motion to seal filed on February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Thirteenth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Anderson Declaration").

4. True and correct copies of the following Exhibits to the Anderson Declaration are as follows and attached hereto:

- *H.F. and C.A. v. Meta, et al.*, 4:24-cv-08885 (Exhibit 1);

- *SB and JC v. Meta, et al.*, 4:24-cv-09400 (Exhibit 2);
- *RN and AR v. Meta, et al.*, 4:24-cv-09406 (Exhibit 3);
- *AG and MT v. Meta, et al.*, 4:24-cv-09354 (Exhibit 4);
- *T.S. ind. & obo E.S. v. ByteDance, Ltd, et al.*, 4:25-cv-00060 (Exhibit 5);
- *L.G. ind. & obo E.B. v. ByteDance, Ltd, et al.*, 4:25-cv-00100 (Exhibit 6);
- *D.M. and M.A. v. Meta, et al.*, 4:25-cv-00118 (Exhibit 7);
- *L.G. ind. & obo K.B. v. ByteDance, Ltd, et al.*, 4:25-cv-00122 (Exhibit 8);
- *E.W. and K.W. v. Meta, et al.*, 4:25-cv-00161 (Exhibit 9);
- *M.S. and S.K. v. Meta, et al.*, 4:25-cv-00169 (Exhibit 10);
- *M.C. ind. & obo A.N. v. Meta, et al.*, 4:25-cv-00270 (Exhibit 11);
- *B.R. and L.R. v. Meta, et al.*, 4:25-cv-00282 (Exhibit 12);
- *A.B. by and through her Guardian Ad Litem Robert Budreau v. Meta, et al.*, 4:25-cv-01269 (Exhibit 13);
- *J. C., by and through his Guardian Ad Litem, Kenyatta Leflore v. Meta, et al.* 4:25-cv-02399 (Exhibit 14); and
- *K.H., by and through April Howell v. Snap Inc et al.*, 4:25-cv-02985 (Exhibit 15).

5. Pursuant to Civil Local Rule 7-11, on June 15, 2023, Defendants agreed to a standing stipulation that the individual applications seeking appointment of guardians *ad litem* in this litigation may be filed under seal. Defendants also confirmed that, in so stipulating, Defendants do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause.

//

//

//

1 I declare under penalty of perjury pursuant to the laws of the United States of America that
2 the foregoing is true and correct.

3 Dated: April 4, 2025

Respectfully submitted,

4 /s/Jennie Lee Anderson
5 Jennie Lee Anderson

6 ANDRUS ANDERSON LLP
7 155 Montgomery Street, Suite 900
8 San Francisco, CA 94104
9 Telephone: (415) 986-1400
10 Facsimile: (415) 986-1474
11 jennie@andrusanderson.com

12 *Plaintiffs' Liaison Counsel*
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28